

Before the
Federal Communications Commission
Washington, DC 20554

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DEC 27 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:]
Amendment of Part 97 of the]
Commission's Rules Governing]
Amateur Radio Service]
Regarding Repeater and]
Auxiliary Operation in the]
1.25 Meter Band]

RM - 7869 RECEIVED
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To: The Commission

FCC MAIL BRANCH

Comments of Richard A. Rudman, W6TIA

I, Richard A. Rudman, amateur call sign W6TIA, hereby respectfully submit my request to the Federal Communications Commission to not take action on the Petition for Rule Making, RM-7869, submitted by the American Radio Relay League. I am a member of the Henry Radio Club of Orange County (HROC) whose repeater input is one of many in the region who would be left without a spectrum allocation if this Rulemaking is adopted.

ARRL's Rulemaking Request is not fair

ARRL's request is an attempt to impose a nationwide solution for the needs of the weak signal amateur community.

Although I hold in highest respect the endeavors of weak signal enthusiasts, it is hard to justify the need for a nationwide allocation of 150 Khz. for their activities.

Weak signal work in our region in the 1.25 Meter Band is a minority activity. Less than 1 percent of band usage in our region has been in use for this activity. While the technical needs of weak signal experimenters may indeed require more spectrum than the current band plan calls for, their needs do not mandate the FCC's entry in a controversy that should be contained within the amateur family.

Local Coordination is the answer

An FCC-mandated nationwide solution would undermine the efforts of groups like 220 SMA in Southern California to work out local accommodations with weak signal enthusiasts. Just because no solution has been worked out in the first six months of 1.25 Meter band restructuring, an issue that was vigorously opposed by a broad swath of the Amateur community, does not mean that ARRL should throw up its hands and say it is impossible for Amateurs to solve this within our "family".

220 Repeaters are Vital Emergency Links

When significant emergencies such as earthquakes occur in our

region, repeaters such as WB6TPG become important communications links. Although the 2 meter band in our region carries the bulk of the emergency traffic load, the 1.25 band serves an important safety net should interference occur, or 2 meter facilities fail. It is also important to note that the Los Angeles Sheriff's Department's Amateur Disaster Communications Service (DCS) uses the 1.25 meter band as back up to the 2 meter band to relay messages from their 22 Sheriff's substations to the Sheriff's Radio Center where the County Emergency Operations Center is located. While not all 1.25 Meter repeaters have their inputs in the part of the band ARRL proposes that the FCC set aside for weak signal work, a regional reduction in repeaters will take enough systems off the air to seriously impact backup emergency communications.

The ARRL's Own Publication Mandates Against This

The ARRL Repeater Directory itself makes a statement that local coordination should take precedence over any national band plan. Should the ARRL, or any group of Amateur Radio Operators, go back on this long standing philosophy?

Conclusions

It is in the best interests of the FCC, the ARRL, local coordination groups, weak signal enthusiasts and the Amateur Community as a whole to leave regional band plan decisions in the hands of local experts. Any attempt at a national weak signal allocation should in turn be hammered out at a conference of local spectrum coordinators. The FCC should not be used to settle what amounts to a matter that should be kept all in our family. Local groups must go the extra mile to seek out weak signal input to make sure their decisions are made with all pertinent facts at hand.

Respectfully Submitted,

December 22, 1991

A handwritten signature in dark ink, appearing to read "Richard A. Rudman", is written over a horizontal line.

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